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Hon. Judge Naomi R. Buchwald
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 2270
New York, New York 10007

Re: Schiavone Construction Co. and American Bridge Co., a Joint
Venture v. The City of New York
Index Number: 07-CV- 8389(NRB)

Dear Judge Buchwald:

I am the attorney for the plaintiff in this case. I am writing to request an extension of time to reply or otherwise respond to defendant's counterclaims from December 19, 2007 to January 21, 2008. Defendant's counsel has consented to this request.

The reason for this request is to allow time for plaintiff to move to dismiss the second and third counterclaims asserted in defendant's answer and/or to serve an amended complaint. As per a conference call with your chambers, plaintiff's motion will be discussed at the initial pretrial/pre-motion conference scheduled for December 20, 2007.

Thank you for your consideration of this request.

Very truly yours,

Vincent J. Toma (VJT-2542)

cc: Richard Schulsohn (by fax)

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